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E-mail: tlaw@reedsmith.com  
  
*Special Insurance Counsel for Debtor  
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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|  |   |                        |
|--|---|------------------------|
| In re:                                   | : | Chapter 11             |
|  | : |                        |
| THE ROMAN CATHOLIC DIOCESE OF            | : | Case No. 20-12345 (MG) |
| ROCKVILLE CENTRE, NEW YORK, <sup>1</sup> | : |                        |
|  | : |                        |
| Debtor.                                  | : |                        |

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**FORTY-SEVENTH MONTHLY STATEMENT OF REED SMITH LLP, AS SPECIAL  
INSURANCE COUNSEL FOR THE DEBTOR AND DEBTOR IN POSSESSION, OF FEES  
FOR PROFESSIONAL SERVICES RENDERED AND DISBURSEMENTS INCURRED FOR  
THE PERIOD AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

|   |   |
|---|---|
| Name of Applicant:  | Reed Smith LLP  |
| Authorized to Provide Professional Services<br>to:                    | Debtor and Debtor in Possession   |
| Date of Retention:  | Order entered on November 4, 2020,<br><i>nunc pro tunc</i> to October 1, 2020 |
| Period for which compensation and<br>reimbursement is sought:         | August 1, 2024 to August 31, 2024   |
| Amount of Compensation sought as actual,<br>reasonable and necessary: | \$168,604.00  |

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<sup>1</sup> The Debtor in this chapter 11 case is The Roman Catholic Diocese of Rockville Centre, New York, the last four digits of its federal tax identification number are 7437, and its mailing address is 50 North Park Avenue P.O. Box 9023, Rockville Centre, NY 11571-9023.

|   |  |
|---|--|
|   | 50% of which is \$84,302.00 <sup>2</sup> |
| Amount of Expense Reimbursement sought as actual, reasonable and necessary: | \$20.50                                  |
| Fees and Expenses of Debtor's Consulting Expert ("Expert F&E")              | \$0.00 <sup>3</sup>                      |
| TOTAL (50% of fees, 100% of costs, 100% of Expert F&E)                      | \$84,322.50                              |

Reed Smith LLP ("Reed Smith"), as Special Insurance Counsel for the Debtor and Debtor-In Possession, hereby submits this forty-seventh monthly statement (the "Monthly Statement") for the period of August 1, 2024 through August 31, 2024 (the "Statement Period") for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court's Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 129] (the "Fee Procedures Order"). Reed Smith requests: (a) interim allowance and payment of compensation in the amount of \$84,302.00 (50% of \$168,604.00) of fees on account of reasonable and necessary professional services rendered to the Debtor by Reed Smith, (b) reimbursement of actual and necessary costs and expenses in the amount of \$20.50 incurred by Reed Smith during the Statement Period, and (c) reimbursement for services rendered, and costs and expenses incurred, by Debtor's consulting expert in the amount of \$0.00.

#### **FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Reed Smith professionals and paraprofessionals who provided services to the Debtor during the Statement Period, their respective

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<sup>2</sup> Per Order Dated December 19, 2023 Regarding Holdback on Professional Fees (Dkt. No. 2743).

<sup>3</sup> Submitted for payment pursuant to *Order Authorizing the Retention of Experts* [Dkt. No. 783], ¶ 3.

billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Debtor during the Statement Period.

| Name                 | Title          | Department           | Office       | JD Year | Rate  | Hours | Amount        |
|----------------------|----------------|----------------------|--------------|---------|-------|-------|---------------|
| Javian, Aaron        | Fix.Sh.Partner | Business and Finance | New York     | 2004    | 1,280 | 0.5   | \$ 640.00     |
| Kramer, Ann          | Fix.Sh.Partner | Litigation           | New York     | 1984    | 1,480 | 56.3  | \$ 83,324.00  |
| Law, Timothy         | Fix.Sh.Partner | Litigation           | Philadelphia | 1995    | 1,330 | 5.8   | \$ 7,714.00   |
| Muha, Andrew         | Fix.Sh.Partner | Litigation           | Pittsburgh   | 2001    | 995   | 44.1  | \$ 43,879.50  |
| LauKamg, Christopher | Paralegal      | Business and Finance | New York     | -       | 435   | 21.5  | \$ 9,352.50   |
| Schad, James         | Paralegal      | Litigation           | Washington   | -       | 640   | 35.3  | \$ 22,592.00  |
| Simmonds, Lianna E.  | Paralegal      | Litigation           | Philadelphia | -       | 380   | 2.9   | \$ 1,102.00   |
|                      |                |                      |              |         |       | 166.4 | \$ 168,604.00 |
|                      |                |                      |              |         |       |       |               |
| <b>TOTAL:</b>        |                |                      |              |         |       | 166.4 | \$ 168,604.00 |

2. The rates charged by Reed Smith for services rendered to the Debtor are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients as described in the engagement letter between Reed Smith and the Debtor. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A.**

### **EXPENSES INCURRED DURING THE STATEMENT PERIOD**

3. Set forth below is a categorical list of expenses incurred by Reed Smith during the Statement Period in the course of representing the Debtor.

| Description                   | Amount          |
|-------------------------------|-----------------|
| Duplicating/Printing/Scanning | \$ 20.50        |
| <b>TOTAL:</b>                 | <b>\$ 20.50</b> |

**NOTICE AND OBJECTION PROCEDURES**

4. Reed Smith has provided notice of this statement upon the following parties by electronic or first class mail: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); and (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13<sup>th</sup> Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.).

5. Pursuant to the Fee Procedures Order, objections to this Monthly Statement, if any, must be served no later than October 11, 2024 (the “Objection Deadline”) upon the following parties: (i) the Debtor, the Roman Catholic Diocese of Rockville Centre, 50 N. Park Avenue, P.O. Box 9023, Rockville Centre, NY 11571 (Attn: Thomas Renker); (ii) counsel to the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); (iii) the Office of the United States Trustee Region 2, Alexander Hamilton Custom House, One Bowling Green, Suite 534, New York, NY 10004 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.); (iv) counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, NY 10017 (Attn: Ilan D. Scharf, Esq., Karen B. Dine, Esq. and Brittany M. Michael, Esq.) and Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Blvd., 13<sup>th</sup> Floor, Los Angeles, CA 90067 (Attn: James I. Stang, Esq.); and (v)

Special Insurance Counsel, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian, Esq. and John B. Berringer, Esq.) and Reed Smith LLP, 1717 Arch Street, Three Logan Square, Suite 3100, Philadelphia, PA 19103 (Attn: Timothy P. Law, Esq.).

6. If no objections to this Monthly Statement are received by the Objection Deadline, the Debtor will be authorized thereafter to pay Reed Smith 50% of the fees and 100% of the expenses identified in the Monthly Statement as well as 100% of the Expert F&E.

7. To the extent an objection to the Monthly Statement is received on or before the Objection Deadline, the Debtor will withhold payment of that portion of the Monthly Statement to which the objection is directed and is authorized to pay the remainder of fees and expenses in the percentages set forth above. To the extent such objection is not resolved, it shall be preserved and presented to the Court at the next interim or final fee application hearing to be heard in accordance with paragraph 2(k) of the Fee Procedures Order.

Dated: September 26, 2024  
New York, New York

REED SMITH LLP

/s/ Aaron Javian  
Aaron Javian, Esq.  
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E-mail: [jberringer@reedsmith.com](mailto:jberringer@reedsmith.com)

-and-

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*Special Insurance Counsel for Debtor  
and Debtor in Possession*

# EXHIBIT A



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R.C. Diocese of Rockville Centre  
50 No. Park Avenue  
Att: William G. Chapin  
Rockville Centre, NY 11570  
US - UNITED STATES

Invoice Number: **3767200**  
Invoice Date: **9/18/2024**  
Client Number: **504893**  
Matter Number: **504893.60005**

**REMITTANCE PAGE**  
*PLEASE RETURN THIS COPY WITH YOUR PAYMENT*

**RE: Chapter 11 Insurance Recovery**

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|  |           |                          |
|--|-----------|--------------------------|
| Total Current Fees.....                        | \$        | 164,962.50               |
| Total Current Expenses and Other Charges ..... | \$        | <u>20.50</u>             |
| <b>Total Due This Invoice:</b>                 | <b>\$</b> | <b><u>164,983.00</u></b> |

Please Remit to:

**Mail To:**  
Reed Smith LLP  
P.O. Box 360110  
Pittsburgh, PA 15251-6110

**Wire Instructions:**  
BNY Mellon Bank N.A.  
Philadelphia, PA  
ABA Number: 031000037  
Swift Code: IRVTUS3N (International)  
Account #2-022-986  
**(Please Reference Invoice Number)**





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R.C. Diocese of Rockville Centre  
50 No. Park Avenue  
Att: William G. Chapin  
Rockville Centre, NY 11570  
US - UNITED STATES

Invoice Number: **3767200**  
Invoice Date: **9/18/2024**  
Client Number: **504893**  
Matter Number: **504893.60005**

**RE: Chapter 11 Insurance Recovery**

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**INVOICE SUMMARY**

|  |           |                          |
|--|-----------|--------------------------|
| Total Current Fees.....                        | \$        | 164,962.50               |
| Total Current Expenses and Other Charges ..... | \$        | <u>20.50</u>             |
| <b>Total Due This Invoice:</b>                 | <b>\$</b> | <b><u>164,983.00</u></b> |

Please Remit to:

**Mail To:**  
Reed Smith LLP  
P.O. Box 360110  
Pittsburgh, PA 15251-6110

**Wire Instructions:**  
BNY Mellon Bank N.A.  
Philadelphia, PA  
ABA Number: 031000037  
Swift Code: IRVTUS3N (International)  
Account #2-022-986  
**(Please Reference Invoice Number)**



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R.C. Diocese of Rockville Centre  
50 No. Park Avenue  
Att: William G. Chapin  
Rockville Centre, NY 11570  
US - UNITED STATES

Invoice Number: **3767200**  
Invoice Date: **9/18/2024**  
Client Number: **504893**  
Matter Number: **504893.60005**

#### DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH August 31, 2024

| Date     | Timekeeper     | Description  | Hours |
|----------|----------------|--|-------|
| 08/01/24 | T.P. Law       | Provide requested information to NYLB.   | 0.30  |
| 08/01/24 | J.C. Schad     | Prepare responses to requests from A. Kramer, T. Law re: additional insureds in the LMI program.   | 0.80  |
| 08/01/24 | A. Kramer      | Address insurance release issues with RS and JD teams.   | 1.80  |
| 08/02/24 | T.P. Law       | Telephone conference with J. Schad and A. Kramer re: insureds under LMI program.   | 0.50  |
| 08/02/24 | C.M. LauKamg   | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.  | 0.80  |
| 08/02/24 | L. E. Simmonds | Obtain Memo Endorsement extending time to file response to Order to Show Cause and calendar court ordered deadline.  | 0.30  |
| 08/02/24 | T.P. Law       | Email exchange re: update to NY Liquidation Bureau.  | 0.40  |
| 08/02/24 | A. Kramer      | Address insurance release issues with RS and JD teams.   | 4.70  |
| 08/02/24 | J.C. Schad     | Prepare materials in support of reports to A. Kramer, T. Law for LMI Bishop's Program insureds (2.80); prepare analysis of CVA suits [REDACTED] (.60); participate in video-conference with A. Kramer, T. Law with follow-up research, reports (1.40). | 4.80  |
| 08/03/24 | A. Kramer      | Email exchanges re: insurance release issues with client, JD and RS teams.   | 0.80  |



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| Date     | Timekeeper   | Description  | Hours |
|----------|--------------|--|-------|
| 08/05/24 | A. Kramer    | Telephone conversation with E. Sorensen re: mediation.   | 0.10  |
| 08/05/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.  | 0.80  |
| 08/06/24 | A. Kramer    | Address mediation issues re: insurance with RS and JD teams.   | 1.10  |
| 08/06/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.  | 0.40  |
| 08/06/24 | A.J. Muha    | Review draft term sheet from insurers and email to A. Kramer re: impressions of term sheet.  | 0.30  |
| 08/07/24 | A. Kramer    | Work in process call with JD, RS and A&M teams re: mediation (.50); address settlement terms with Insurers, Client and JD team (2.70); mediation Zoom with mediators, committee et al. (1.70); follow-up call with Client (.30).   | 5.20  |
| 08/07/24 | T.P. Law     | Edit and finalize letter to Deputy Receivers of Arrowood.  | 1.10  |
| 08/07/24 | T.P. Law     | Draft definitions of various insurance companies for use by Jones Day.   | 0.80  |
| 08/07/24 | T.P. Law     | Attend work in process call with Jones Day and Reed Smith teams.   | 0.80  |
| 08/07/24 | J.C. Schad   | Prepare report to A. Kramer, T. Law re: Settlement Term Sheet List of London Market policies with potential SA coverage (.90); research evidence of London Market policies from various sources and prepare revised list of London Market Policies (2.30); prepare report to A. Kramer and T. Law (.60). | 3.80  |
| 08/08/24 | T.P. Law     | Draft email to C. Ball responding to question about [REDACTED].  | 1.40  |
| 08/08/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY  | 1.00  |



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| Date     | Timekeeper   | Description   | Hours |
|----------|--------------|---|-------|
|          |              | docket for pleadings then update master files and calendar.   |       |
| 08/09/24 | A. Kramer    | Work re: mediation/settlement with JD and RS teams (.70); telephone conversation with C. Sugayan re: same (.50).  | 1.20  |
| 08/09/24 | C.M. LauKamg | Arrange USBC SDNY August 15, 2024 Hearing Appearances and circulate confirmations of same.  | 0.60  |
| 08/09/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.   | 0.80  |
| 08/12/24 | A. Kramer    | Communications with JD and RS Teams re: mediation (.40); communications with Client, Insurers, JD team and J. Schad re: WC coverage questions (1.30).   | 1.70  |
| 08/12/24 | J.C. Schad   | Prepare report to A. Kramer, T. Law re: certain provisions under Workers' Comp/Employer's Liability coverages in Bishop's Program policies (.90); provide additional policy materials, coverage provisions for supplemental reports to A. Kramer, T. Law re: historic Allianz, LMI policies (1.30). | 2.20  |
| 08/13/24 | A. Kramer    | Email exchanges with Insurers re: WC cover (.30); Zoom call with Insurers and B. Rosenthal re: settlement terms (.60); email exchanges with JD Team re: mediation (.30).  | 1.20  |
| 08/13/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.   | 0.80  |
| 08/14/24 | A. Kramer    | Address mediation issues with insurers, committee, JD Team and mediators.   | 5.60  |
| 08/14/24 | C.M. LauKamg | Revise USBC SDNY August 15, 2024 Hearing Appearances and circulate confirmations of same.   | 0.60  |



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| Date     | Timekeeper   | Description   | Hours |
|----------|--------------|---|-------|
| 08/15/24 | A. Kramer    | Attend court hearing (.50); follow up email exchanges with JD and RS teams re: next steps etc. (1.70); teams call with client and JD team re: next steps (.40); communications with mediators and insurers re: same (.50); mark-up insurer non-monetary terms (.40); review and forward Committee response (.10). | 3.60  |
| 08/15/24 | T.P. Law     | Email exchanges with A. Kramer re: settlement negotiations.   | 0.50  |
| 08/15/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.   | 0.80  |
| 08/16/24 | J.C. Schad   | Correlative analysis re: coverage for additional entities under the LMI Bishop's Program for report to A. Kramer re: term sheet draft Exhibit C (1.80); report to A. Butler re: certain entities' identified locations outside the Diocese (.50).   | 2.30  |
| 08/16/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.   | 0.60  |
| 08/16/24 | A. Kramer    | Zoom mediation call with mediators (1.0); communications with client et al. re: WC cover (.40); communications with JD Team re: mediation issues (.40).   | 1.80  |
| 08/19/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.   | 0.80  |
| 08/19/24 | A.J. Muha    | Call with A. Kramer re: status issues in DRVC bankruptcy.   | 0.50  |
| 08/19/24 | A.J. Muha    | Follow-up call with A. Kramer.  | 0.10  |
| 08/19/24 | A. Kramer    | Briefing A. Muha re: mediation etc. (.50); forwarding materials to Muha (.50); teams conference with JD and RS teams re: releasors issue (1.80).  | 2.80  |



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| Date     | Timekeeper   | Description  | Hours |
|----------|--------------|--|-------|
| 08/19/24 | A.J. Muha    | Participate in call with A. Kramer, J. Schad, B. Rosenblum and A. Booth re: insureds under DRVC insurance program.   | 1.30  |
| 08/19/24 | A.J. Muha    | Review and analysis of information about DRVC bankruptcy negotiations with insurers on plan and settlement issues.   | 1.70  |
| 08/19/24 | A.J. Muha    | Notes following call with A. Kramer.   | 0.20  |
| 08/19/24 | J.C. Schad   | Prepare revisions to exhibit in preparation for conference (1.80); conference call with A. Kramer, A. Muha, A. Butler (Jones Day), B. Rosenblum (Jones Day) re: term sheets (1.40); revise materials in accordance with discussion for transmission and review (1.10). | 4.30  |
| 08/20/24 | A.J. Muha    | Follow-up notes and emails with co-counsel re: issues raised during mediation call.  | 0.50  |
| 08/20/24 | A.J. Muha    | Prepare for and participate in mediation call with Committee, insurer and Debtors.   | 0.80  |
| 08/20/24 | A.J. Muha    | Call with A. Kramer re: information on open issues with insurers.  | 0.50  |
| 08/20/24 | A.J. Muha    | Continue review and analysis of insurance documents and materials regarding additional insureds and prepare memo summarizing issues for negotiation with LMI and Allianz.  | 3.40  |
| 08/20/24 | J.C. Schad   | Attention to LMI policies, other policy evidence for reports with supporting materials to A. Kramer re: Worker's Comp, General Liability coverages.  | 0.80  |
| 08/20/24 | A. Kramer    | Zoom call with mediators, debtor, creditor and insurer teams.  | 0.60  |
| 08/20/24 | A.J. Muha    | Continue review and analysis of issues re: [REDACTED].   | 1.00  |
| 08/21/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.  | 0.80  |
| 08/21/24 | A.J. Muha    | Attention to issues relating to [REDACTED].  | 1.50  |



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| Date     | Timekeeper     | Description  | Hours |
|----------|----------------|--|-------|
| 08/21/24 | A. Kramer      | Work in process call with JD and A&M teams re: mediation etc. (.40); teams call with client, JD and RS teams re: additional insured questions (1.30); work with RS team to address questions re: insurer terms (1.50). | 3.20  |
| 08/21/24 | A.J. Muha      | Attention to insurer mediation statements per request of C. Ball and emails with A. Kramer and L. Simmonds re: same.   | 0.60  |
| 08/21/24 | A.J. Muha      | Multiple follow-up emails with A. Kramer, B. Rosenblum and A. Butler re: proposed message to insurers re: updates to additional insured lists to determine entities giving releases of DRVC policies.                  | 0.50  |
| 08/21/24 | A.J. Muha      | Draft and revise proposed message to insurers re: updates to additional insured lists to determine entities giving releases of DRVC policies.  | 1.20  |
| 08/21/24 | A.J. Muha      | Call with clients and debtor's counsel re: additional insured issues and follow-up discussions with A. Kramer, B. Rosenblum and A. Butler re: same.  | 1.40  |
| 08/21/24 | A.J. Muha      | Continue review and analysis of case materials in advance of call with clients re: additional insured issues.  | 1.00  |
| 08/21/24 | L. E. Simmonds | Analyze file and transmit all insurance company mediation statements for analysis.   | 1.00  |
| 08/22/24 | L. E. Simmonds | Analyze file to obtain 2019 Notice Letters.  | 0.60  |
| 08/22/24 | L. E. Simmonds | Retrieve Order re: case being assigned to magistrate judge and calendar deadline to inform the court if parties consent to same.   | 0.40  |
| 08/22/24 | C.M. LauKamg   | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.  | 0.80  |
| 08/22/24 | J.C. Schad     | Attention to archive materials and correspondence re: additional insureds in the LMI program for reports to A. Kramer and A. Muha  | 4.40  |





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| Date     | Timekeeper   | Description   | Hours |
|----------|--------------|---|-------|
|          |              | (1.60); transmit requested policy materials to A. Muha with summary reports (1.40); attention to reports to A. Kramer and A. Muha re: SA exclusion, policy materials and post-1986 coverages (1.40).                |       |
| 08/22/24 | A.J. Muha    | Call with C. Ball, B. Rosenblum, B. Chapin and A. Kramer re: LMI list of additional insureds.   | 0.90  |
| 08/22/24 | A.J. Muha    | Continue analysis of case materials regarding [REDACTED].   | 0.80  |
| 08/22/24 | A.J. Muha    | Review and additional comments and emails with Debtor's counsel on response to Allianz list of additional insureds.   | 0.80  |
| 08/22/24 | A.J. Muha    | Call with A. Kramer re: supplemental injunction and related terms proposed by Interstate/Allianz.   | 0.60  |
| 08/22/24 | A.J. Muha    | Prepare for and call with E. Sorensen (coverage counsel for parishes) and A. Kramer re: case status issues.   | 0.40  |
| 08/22/24 | A.J. Muha    | Analysis of supplemental injunction and related terms proposed by Interstate/Allianz.   | 1.20  |
| 08/22/24 | A.J. Muha    | Emails with A. Kramer re: status issues.  | 0.30  |
| 08/22/24 | A.J. Muha    | Prepare annotated version of LMI list of additional insureds per A. Kramer request.   | 0.60  |
| 08/22/24 | A.J. Muha    | Analysis of historic policy materials and multiple emails with RS team and with Debtor's counsel re: policies referred to in LMI list of additional insureds.   | 2.60  |
| 08/22/24 | A. Kramer    | Call with A. Muha re: insurer terms issues (.70); review client message re: insurance (.30); email exchanges with RS and JD Teams re: insurer terms (3.70); teams call with client, JD and RS teams re: same (.80). | 5.50  |
| 08/23/24 | C.M. LauKamg | Arrange USBC SDNY September 5, 2024 Hearing Appearances and circulate confirmations of same.  | 0.40  |
| 08/23/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY   | 0.80  |





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| Date     | Timekeeper | Description   | Hours |
|----------|------------|---|-------|
|          |            | adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.   |       |
| 08/23/24 | A.J. Muha  | Review memo from J. Schad re: LMI coverage periods for policies on which LMI identified additional insureds and follow-up emails re: same.  | 0.50  |
| 08/23/24 | A.J. Muha  | Participate in mediation call with Debtor's counsel, counsel for Committee and counsel for insurers.  | 1.40  |
| 08/23/24 | A.J. Muha  | Follow-up call with A. Kramer re: mediation call and next-steps.  | 0.20  |
| 08/23/24 | A.J. Muha  | Review materials and prepare email memo to J. Schad re: information on post-1986 LMI coverage.  | 0.80  |
| 08/23/24 | A. Kramer  | Email exchanges with insurers, JD and RS teams re: settlement terms (1.30); Zoom call with mediators, committee, insurers, JD and RS teams re: insurance issues (1.30).   | 2.60  |
| 08/23/24 | A.J. Muha  | Follow-up emails to/from J. Schad re: post-1986 LMI coverage.   | 0.20  |
| 08/23/24 | J.C. Schad | Attention to stored files re: post-1986 LMI program and review prior work product re: post-1986 LMI coverage, analyze, revise, transmit report to A. Muha, A. Kramer re: Term Sheet Exhibit (.80); prepare reports re: policy provisions, program structure and follow form structure (2.50); attention to re: historic retention payments and report re: potential exposure to long tail risk (.50). | 3.80  |
| 08/25/24 | J.C. Schad | Identify, notate, record policy materials, evidence, insurance information re: LMI post-1986 policies for access (4.0); conceive, prepare report to A. Muha and A. Kramer re: potential impact of claims by settlement of LMI program (1.20).   | 5.20  |
| 08/26/24 | A. Kramer  | Email exchanges re: insurer terms with JD and RS teams (1.80); teams call with Client,  | 2.40  |



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| Date     | Timekeeper   | Description  | Hours |
|----------|--------------|--|-------|
|          |              | Rosenblum and Muha re: same (.50); email exchange re: Subramanian order (.10).   |       |
| 08/26/24 | J.C. Schad   | Attention to general liability insurance forms for follow-up report to A. Kramer and A. Muha.  | 0.40  |
| 08/26/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.  | 0.80  |
| 08/26/24 | A.J. Muha    | Review and respond to internal emails re: updates on Als.  | 0.50  |
| 08/26/24 | A.J. Muha    | Review historical insurance information and email to team re: Allianz post-1986 coverage.  | 0.60  |
| 08/26/24 | A.J. Muha    | Review and analyze redline response to insurer settlement term sheet and multiple emails with A. Kramer re: same.  | 0.70  |
| 08/26/24 | A.J. Muha    | Review and draft comments on proposed response to Allianz inquiries regarding additional insureds.   | 0.50  |
| 08/26/24 | A.J. Muha    | Follow-up emails re: status issues.  | 0.20  |
| 08/26/24 | A.J. Muha    | Call with B. Rosenblum, B. Chapin, A. Kramer and A. Butler re: status issues.  | 0.50  |
| 08/26/24 | A.J. Muha    | Review and analyze post-1986 LMI policy materials collected by J. Schad and notes re: same.  | 3.10  |
| 08/27/24 | A. Kramer    | Work re: insurer terms issues with JD and RS teams (1.80); mediation call (1.30); email exchange with broker et al. re WC issue (.70); email exchange re: Subramanian order (.20). | 4.00  |
| 08/27/24 | A.J. Muha    | Participate in mediation call.   | 1.30  |
| 08/27/24 | A.J. Muha    | Emails with A. Kramer re: case status issues.  | 0.40  |
| 08/27/24 | A.J. Muha    | Review email and materials from J. Schad re: post-1986 Allianz coverage.   | 0.50  |
| 08/27/24 | J.C. Schad   | Identify, notate and record post-1986 policies issued by insurer (1.10); analyze, prepare, transit   | 1.40  |



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| Date     | Timekeeper   | Description   | Hours |
|----------|--------------|---|-------|
|          |              | reports to A. Kramer and A. Muha re: policy materials (.30).  |       |
| 08/28/24 | A. Kramer    | Catch up call with Muha re: developments (.40); communications with insurer counsel and Muha re: consent to Cave referral (.40); mediation zoom calls (.80); communications with JD and RS teams re: insurer terms issues (1.50). | 3.10  |
| 08/28/24 | C.M. LauKamg | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.   | 0.80  |
| 08/28/24 | A.J. Muha    | Review and prepare comments on updated draft term sheet from B. Rosenblum and follow-up emails re: same.  | 0.80  |
| 08/28/24 | A.J. Muha    | Additional emails re: case status issues.   | 0.50  |
| 08/28/24 | A.J. Muha    | Follow-up emails and call with J. Moffitt re: opt-in referral of LMI coverage action to Magistrate Judge Cave.  | 0.40  |
| 08/28/24 | A.J. Muha    | Follow-up call with Debtor's counsel and Committee counsel re: settlement term issues.  | 0.20  |
| 08/28/24 | A.J. Muha    | Participate in mediation call.  | 0.60  |
| 08/28/24 | A.J. Muha    | Work on form to opt-into referral of LMI coverage action to Magistrate Judge Cave and emails with A. Kramer re: same.   | 1.00  |
| 08/28/24 | A.J. Muha    | Call with A. Kramer re: client call and case status issues.   | 0.50  |
| 08/28/24 | A.J. Muha    | Participate in bi-weekly case status call with client team.   | 0.50  |
| 08/29/24 | A. Kramer    | Communications with A. Muha re: mediation (.20); communications with insurers and A. Muha re: reference of the LMI action to MJ Cave (.40).   | 0.60  |
| 08/29/24 | C.M. LauKamg | Arrange USBC SDNY September 5, 2024 Hearing Appearances and circulate confirmations of same.  | 0.60  |



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| Date     | Timekeeper     | Description  | Hours |
|----------|----------------|--|-------|
| 08/29/24 | C.M. LauKamg   | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.                      | 0.80  |
| 08/29/24 | A.J. Muha      | Analysis of next-steps.  | 0.10  |
| 08/29/24 | A.J. Muha      | Multiple emails with counsel for LMI and Lexington and finalize and prepare notice of consent of parties to referral of LMI coverage suit to magistrate judge. | 0.60  |
| 08/29/24 | A.J. Muha      | Emails to/from A. Kramer re: update on mediation call.   | 0.20  |
| 08/29/24 | A.J. Muha      | Participate in mediation call.   | 0.20  |
| 08/29/24 | L. E. Simmonds | Finalize and file Notice, Consent and Reference of a Civil Action to a Magistrate Judge.   | 0.60  |
| 08/30/24 | A. Kramer      | Communications with RS and JD teams re: mediation (1.20); zoom call with client, JD and RS teams (.70).  | 1.90  |
| 08/30/24 | C.M. LauKamg   | Analyze USBC SDNY docket, USBC SDNY adversary proceeding docket and USDC SDNY docket for pleadings then update master files and calendar.                      | 0.80  |
| 08/30/24 | A.J. Muha      | Emails with A. Kramer and review emails from Insurers re: further asks from Insurers on non-monetary terms.  | 0.30  |
| 08/30/24 | A.J. Muha      | Video Conference with B. Rosenblum and A. Kramer re: negotiation status.   | 0.50  |
| 08/30/24 | A.J. Muha      | Call with A. Kramer re: status updates.  | 0.20  |
| 08/30/24 | A.J. Muha      | Video Conference with Client, B. Rosenblum, C. Ball and A. Kramer re: negotiations with Insurers and Committee.  | 0.70  |
| 08/30/24 | A.J. Muha      | Emails with Debtor's counsel team re: availability for call to discuss additional requests from Committee.   | 0.10  |
| 08/30/24 | A.J. Muha      | Follow-up email and call with A. Kramer.   | 0.20  |



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| Date               | Timekeeper | Description  | Hours         |
|--------------------|------------|--|---------------|
| 08/31/24           | A. Kramer  | Communications with JD and RS teams re mediation issues  | 0.80          |
| 08/31/24           | J.C. Schad | Prepare report to A. Kramer re: status of certain post-1986 and pre-1986 limits of insurance available under the LMI program (.90); consult with A. Kramer re: recoverable limits under certain LMI program coverages, historic recoveries and loss profile (.20). | 1.10          |
| 08/31/24           | A.J. Muha  | Multiple emails re: negotiation status issues.   | 0.40          |
| <b>Total Hours</b> |            |  | <b>159.00</b> |

#### SUMMARY OF PROFESSIONAL SERVICES:

| Timekeeper                         | Hours          | Rate          | Total             |
|------------------------------------|----------------|---------------|-------------------|
| Ann V. Kramer                      | 56.30 hrs @ \$ | 1,480.00 / hr | 83,324.00         |
| Timothy P. Law                     | 5.80 hrs @ \$  | 1,330.00 / hr | 7,714.00          |
| Andrew J. Muha                     | 44.10 hrs @ \$ | 995.00 / hr   | 43,879.50         |
| James C. Schad                     | 35.30 hrs @ \$ | 640.00 / hr   | 22,592.00         |
| Christopher LauKamg                | 14.60 hrs @ \$ | 435.00 / hr   | 6,351.00          |
| Lianna E. Simmonds                 | 2.90 hrs @ \$  | 380.00 / hr   | 1,102.00          |
| <b>Total Professional Services</b> |                |               | <b>164,962.50</b> |

#### DISBURSEMENTS AND OTHER CHARGES

| Date                                    | Description                   | Amount        |
|---|-------------------------------|---------------|
|   | Duplicating/Printing/Scanning | 205.00 @ 0.10 |
| <b>Total Expenses and Other Charges</b> |                               | <b>20.50</b>  |

#### INVOICE SUMMARY

Total Fees \$ 164,962.50



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Total Expenses and Other Charges \$ 20.50

**TOTAL CURRENT INVOICE DUE** \$ **164,983.00**

**Total Amount Due** \$ **164,983.00**



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R.C. Diocese of Rockville Centre  
50 No. Park Avenue  
Att: William G. Chapin  
Rockville Centre, NY 11570  
US - UNITED STATES

Invoice Number: **3767211**  
Invoice Date: **9/18/2024**  
Client Number: **504893**  
Matter Number: **504893.60006**

**REMITTANCE PAGE**  
*PLEASE RETURN THIS COPY WITH YOUR PAYMENT*

**RE: Fee statements/fee applications**

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Total Current Fees.....\$ 3,641.50

**Total Due This Invoice:** \$ 3,641.50

Please Remit to:

**Mail To:**  
Reed Smith LLP  
Lockbox 10096  
PO BOX 70280  
Philadelphia, PA 19176-0280

**Wire Instructions:**  
BNY Mellon Bank N.A.  
Philadelphia, PA  
ABA Number: 031000037  
Swift Code: IRVTUS3N (International)  
Account #2-022-986  
**(Please Reference Invoice Number)**



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R.C. Diocese of Rockville Centre  
50 No. Park Avenue  
Att: William G. Chapin  
Rockville Centre, NY 11570  
US - UNITED STATES

Invoice Number: **3767211**  
Invoice Date: **9/18/2024**  
Client Number: **504893**  
Matter Number: **504893.60006**

**RE: Fee statements/fee applications**

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#### INVOICE SUMMARY

|                                |                           |
|--------------------------------|---------------------------|
| Total Current Fees.....        | \$ 3,641.50               |
| <b>Total Due This Invoice:</b> | <b>\$ <u>3,641.50</u></b> |

Please Remit to:

**Mail To:**  
Reed Smith LLP  
Lockbox 10096  
PO BOX 70280  
Philadelphia, PA 19176-0280

**Wire Instructions:**  
BNY Mellon Bank N.A.  
Philadelphia, PA  
ABA Number: 031000037  
Swift Code: IRVTUS3N (International)  
Account #2-022-986  
**(Please Reference Invoice Number)**





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50 No. Park Avenue  
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Rockville Centre, NY 11570  
US - UNITED STATES

Invoice Number: **3767211**  
Invoice Date: **9/18/2024**  
Client Number: **504893**  
Matter Number: **504893.60006**

**DETAIL FOR PROFESSIONAL SERVICES RENDERED THROUGH August 31, 2024**

| Date     | Timekeeper   | Description  | Hours |
|----------|--------------|--|-------|
| 08/06/24 | C.M. LauKamg | Review USBC SDNY Reed Smith LLP Forty-Sixth Monthly Fee Statement in preparation for electronic filing.  | 0.80  |
| 08/07/24 | C.M. LauKamg | Revise USBC SDNY Reed Smith LLP Forty-Sixth Monthly Fee Statement in preparation for electronic filing.  | 0.40  |
| 08/08/24 | C.M. LauKamg | Revise USBC SDNY Reed Smith LLP Forty-Sixth Monthly Fee Statement in preparation for electronic filing.  | 0.60  |
| 08/08/24 | C.M. LauKamg | Prepare USBC SDNY Certificate of No Objection for Reed Smith LLP Forty-Fifth Monthly Fee Statement in preparation for electronic filing.                                 | 0.40  |
| 08/12/24 | C.M. LauKamg | Revise USBC SDNY Reed Smith LLP Forty-Sixth Monthly Fee Statement in preparation for electronic filing.  | 0.40  |
| 08/12/24 | C.M. LauKamg | Finalize, electronically file and serve USBC SDNY Certificate of No Objection for Reed Smith LLP Forty-Fifth Monthly Fee Statement and update master files and calendar. | 0.80  |
| 08/14/24 | C.M. LauKamg | Finalize USBC SDNY Reed Smith LLP Forty-Sixth Monthly Fee Statement in preparation for electronic filing.  | 0.80  |
| 08/15/24 | C.M. LauKamg | Finalize USBC SDNY Reed Smith LLP Forty-Sixth Monthly Fee Statement in preparation for electronic filing.  | 1.00  |
| 08/15/24 | C.M. LauKamg | Finalize, electronically file and serve Reed Smith LLP Forty-Sixth Monthly Fee Statement and   | 0.50  |



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ABU DHABI ♦ ATHENS ♦ AUSTIN ♦ BEIJING ♦ BRUSSELS ♦ CENTURY CITY ♦ CHICAGO ♦ DALLAS ♦ DUBAI ♦ FRANKFURT ♦ HONG KONG ♦ HOUSTON ♦ KAZAKHSTAN ♦ LONDON ♦ LOS ANGELES ♦ MIAMI  
MUNICH ♦ NEW YORK ♦ ORANGE COUNTY ♦ PARIS ♦ PHILADELPHIA ♦ PITTSBURGH ♦ PRINCETON ♦ RICHMOND ♦ SAN FRANCISCO ♦ SHANGHAI ♦ SILICON VALLEY ♦ SINGAPORE ♦ TYSONS ♦ WASHINGTON, D.C. ♦ WILMINGTON

| Date               | Timekeeper   | Description   | Hours       |
|--------------------|--------------|---|-------------|
|                    |              | update master files and calendar.   |             |
| 08/15/24           | A. Javian    | Attention to monthly fee statement.   | 0.50        |
| 08/21/24           | C.M. LauKamg | Finalize, electronically file and serve USBC SDNY Certificate of No Objection for Reed Smith LLP Forty-Fourth Monthly Fee Statement and update master files and calendar. | 0.80        |
| 08/28/24           | C.M. LauKamg | Prepare USBC SDNY Certificate of No Objection for Reed Smith LLP Forty-Sixth Monthly Fee Statement in preparation for electronic filing.                                  | 0.40        |
| <b>Total Hours</b> |              |   | <b>7.40</b> |

#### SUMMARY OF PROFESSIONAL SERVICES:

| Timekeeper                         | Hours         | Rate          | Total           |
|------------------------------------|---------------|---------------|-----------------|
| Aaron Javian                       | 0.50 hrs @ \$ | 1,280.00 / hr | 640.00          |
| Christopher LauKamg                | 6.90 hrs @ \$ | 435.00 / hr   | 3,001.50        |
| <b>Total Professional Services</b> |               |               | <b>3,641.50</b> |

#### INVOICE SUMMARY

|                                  |                    |
|----------------------------------|--------------------|
| Total Fees                       | \$ 3,641.50        |
| <b>TOTAL CURRENT INVOICE DUE</b> | <b>\$ 3,641.50</b> |
| <b>Total Amount Due</b>          | <b>\$ 3,641.50</b> |